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February 27, 2025

VIA ECF

Honorable Ann Marie Donio
United States Magistrate Judge
United States Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Salix Pharms., Inc. et al. v. Norwich Pharms., Inc., et al.*, Civ. No. 24-7140 (ESK-AMD);
Salix Pharms., Inc. et al. v. Zydus Pharms. (USA) Inc., et al., Civ. No. 24-9512 (ESK-AMD);
Salix Pharms., Inc. et al. v. Cipla USA, Inc., et al., Civ. No. 24-10213 (ESK-AMD);
Salix Pharms., Inc. et al. v. Carnegie Pharms. LLC, Civ. No. 24-10356 (ESK-AMD).

Dear Judge Donio:

We represent the Plaintiffs in the above-captioned consolidated matter. We write jointly with counsel for the above-referenced Defendants to respectfully request that the Court sign and enter the enclosed proposed Stipulated Discovery Confidentiality Order ("DCO"). Enclosed, please also find redline comparisons of: (i) the proposed DCO with the DCO entered in the *Salix v. Amneal* matter (Civ. No. 24-4607 (ESK-AMD)); and ii) the proposed DCO to the Discovery Confidentiality Order found in Appendix S of the Local Rules.

We thank the Court for its time and attention to this matter and are available at the Court's convenience to address any questions or concerns.

Respectfully submitted,



/s/ Harvey Bartle

Harvey Bartle

cc: Counsel of Record (via e-mail)

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